



Adventures in the Community Eligibility Provision

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Disclaimer: This presentation represents Kentucky's best practices and experience with implementing the Community Eligibility Provision. States should reference the current USDA regulations and guidance during implementation. The presentation was developed for the State Agency conference on Administrative Reviews held in Crystal City, Virginia in December 2013. Slides presented during that conference are incorporated in this presentation and additional slides have been included to further elaborate on CEP implementation issues.



CEP: Charting the Journey

- ✦ Project Planning
- ✦ Reaching the LEAs
- ✦ Pulling it all together
- ✦ Additional resources

A good project plan is invaluable. The following slides share our experiences with implementing CEP and provide our best practices along with a suggested chronological list of key milestones. Each state operates in its own context but this is intended to present issues that merit decision-making and to stir discussion. CEP has proven very beneficial to Kentucky's LEAs and children: the advantages far outweigh the drawbacks.

Month 6: Laying the Groundwork

- ✦ Identify the team
 - Project leader
- ✦ Stakeholder list
 - Who is impacted by CEP
- ✦ Risk identification
 - Threats vs. Opportunities

The first step plan for implementing CEP will be to identify the project team early on. The project team will guide the process to completion. If you are not located within the Department of Education within your state I would recommend that you include a representative from the state education agency.

Numerous entities will be affected by CEP and it's important to understand the wide ranging effects of CEP. Thus, a list of stakeholders is recommended to find who should be contacted about CEP and what discussions need to occur: what will be the impact on this person/organization. From this matrix you develop a communication plan (e.g., email, phone, newsletter, meeting, etc.) to inform the stakeholder on CEP's impact. Best Practice: To identify the full list of stakeholders you can ask the key stakeholders who *they* would recommend as stakeholders.

A risk register should be compiled of threats and opportunities. Involve the team with this exercise. Post-it notes work well. A threat would be an impediment to project success if it occurred and opportunities are those that have a positive impact. Assigning a score to the probability and impact (low, medium or high) determines the priority for each entry. Focus on those with high impact and high probability throughout the project.

Both the stakeholder list and risk register should be revisited periodically. Search for templates on projectmanagement.com or Google both these terms to find examples.

Month 5: Meetings

- ✧ Alternative Income Form
 - Necessary for individual SES
 - Assessment, state education funding, etc.
- ✧ System Design and Processing
 - Initiate changes for CEP
- ✧ Communication Plan
 - State education agency, districts, and public
- ✧ Training Plan
 - LEAs on CEP

The first month of the project team will be given over to meetings. Sorry about that. A lot of decisions need to be made early on: a lot. And then those decisions need to be communicated to the persons responsible for implementing the change. System changes to your claims and application system, use of the alternative income form, meetings with Title 1 and eRate representatives amongst many others. And don't forget the sponsors: how to introduce CEP to them in an effective manner.

System Design

✦ Changes to Claims/Application System

- Gap analysis to determine needed modifications to system
 - Sponsor Application
 - Site Application
 - CEP Grouping Tool
 - Claim



Notice! Please analyze your system 5+ months prior to implementation for system design, development and testing. Your project manager will thank you.

System changes will need to be made to accommodate CEP. Your project team should conduct a gap analysis to determine what you currently have to accommodate CEP and the changes that will still need to be made. The process to design and build will take some time, so this phase merits priority. Please give your project manager (or vendor) sufficient notice of these changes. A set of flowcharts and business rules may need to be developed to assist in explaining the entire process.

CEP can be implemented doing a manual process – but it is advantageous to incorporate it within your system. This will result in fewer errors and less paperwork.

Month 4: Training

- Financial viability: School should be about 50-55% DC for CEP participation
 - Solution: Utilize USDA Calculator
- Partial CEP Participation: Consider impact of only offering CEP to some schools
- Alternative Income Form: Assign district staff person to collect and process forms
 - Solution: Inform district leadership of responsibility

Solid training of LEAs on CEP is essential: they need to know the benefits and drawbacks of CEP. The most important consideration is financial viability. CEP must be financially viable to participate. Any food service shortfall must be covered by the district's general fund. We have found the percentage to be around 50-55% but it varies (higher/lower) based on existing student participation in SBP/NSLP, cost per meal, reimbursement levels, etc. The USDA calculator is a good tool to use when determining financial viability. The calculator does include a means to account for an increase in breakfast/lunch participation.

Partial CEP participation can be contentious. In an LEA, only some of the schools may be eligible for CEP and others may not. If the LEA has 5 elementary schools and only 3 are eligible for CEP, then the food service director may receive pushback from parents and community members on why the other 2 elementary schools are not receiving meals at no charge. Possible answers to this include the higher poverty rate in those schools-and thus they qualify for CEP. Another answer is that CEP is being piloted for first year and it may be expanded to other schools if it is successful.

Because Kentucky uses free meal status in the state education funding formula, we needed to collect individual socioeconomic status on students (more on this later). Thus, it's important to communicate to our LEAs that the district will need to collect and process the alternative income forms, which must be paid out of the district's general fund.

And don't forget reaching out to other stakeholders based on the decisions that have been made regarding the alternative income form. This may include school board associations,

school employee associations, Title 1 coordinators, etc. You can accomplish this through webinars or live presentations during their convention meetings. It's very important to build networks and relationships on CEP's impact to LEA staff.

Month 3: Technical Assistance

✧ Direct Certification

- Work with LEAs to obtain highest, most accurate DC percentages for CEP

✧ CEP decision-making

- Assist LEAs with understanding CEP

In this phase the State Agency assists LEAs with decision-making on CEP participation. A full understanding on the benefits and responsibilities associated with the program are explored. The key topics include financial viability and the impact on Title 1 with CEP. With April DC reporting the LEAs focus on preparations for that. More information on this issue will be discussed in the next slide.

Month 2: Final Preparations

- ✧ April DC reporting
 - Work with LEAs on April DC reporting and responsibility for archiving supporting documents
- ✧ System Testing
 - Conduct testing on claims and application system to ensure readiness
- ✧ Stakeholder review
 - Contact stakeholders and address concerns

By now the deadline for participation in CEP is nearing. LEAs are reporting their April DC information and determining internally on their decision. Communication with stakeholders is ongoing. This can include district staff and superintendents. A letter outlining the district's responsibilities, its effect on Title 1, eRate, assessment, student fee waivers, etc. may need to be compiled by the education agency to be shared with superintendents, especially if an alternative income form will need to be processed. A frequently asked questions document can be compiled and posted on the agency's website. Final testing is being performed on the system for the application and claims components. At this time you will need to be in contact with your key stakeholders to ensure their concerns have been addressed.

Maximize Direct Certification

✦ April DC Matching

- Utilize DC History file for matching
 - Contains all DC files from July to current month
- All LEA-level identified students
 - Runaway, Migrant, Homeless, Head Start, etc. through a signed and dated list
- Manual matching
 - Locate any additional students missed by automated DC matching process

Since the DC percentages set the claim reimbursement for CEP sites, sponsors may need assistance to obtain the highest DC percentages. All LEAs in Kentucky are instructed to import the DC history file, a compilation of all DC students from July through the current month (inclusive). Following that import the LEA should ensure they have all the LEA-level identified students who can be considered DC. The food service director will be obtaining lists of homeless, migrant, Head Start, etc. students that can also be directly certified based on a signed and dated list from the appropriate coordinator. Finally, the LEA should manually scan the DC list to determine if other households can be determined as DC that the automated process may have missed. This may be due to name misspellings, missing SSNs, etc.

Month 1: Implementation

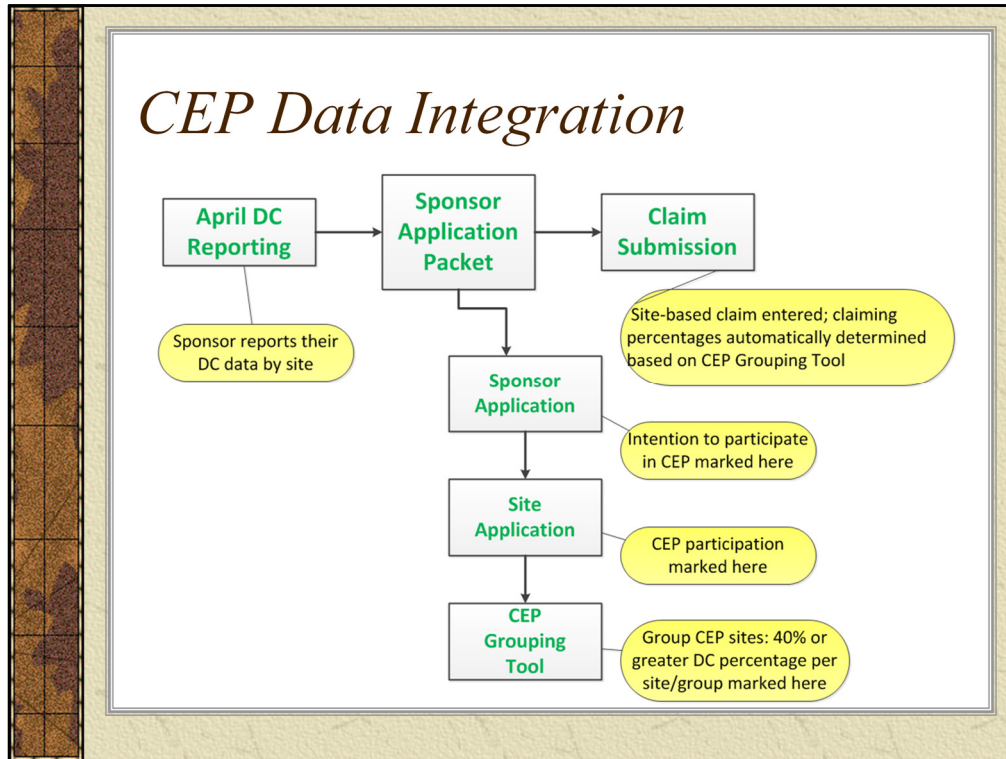
✧ System Training

- Train LEAs on electing CEP, including use of CEP grouping tool
- Train staff on CEP application approvals

✧ Publicity

- Communication on benefits of CEP and eligibility criteria

In this phase the LEAs are electing CEP in the claim and application system. The State Agency is training sponsors how to mark CEP in the sponsor application packet , use the CEP grouping tool and state staff are being trained on approving the sponsor application packets. LEAs are publicizing CEP to the community and the necessity (if applicable) on returning the alternative income form.



Our system is full integrated for CEP—from April DC Reporting through claim submission. I want to discuss the process by which sponsors will enter their data to participate in CEP, providing details on each step.

In April sponsors report their total DC students and total students with access to SBP/NSLP per site. Our system automatically calculates the DC percentage, informing them of the site's CEP eligibility or near eligibility. Once all sponsors have entered their information an Excel spreadsheet is produced from the system and the April DC data is posted on the SCN website.

Next, the sponsor completes the sponsor application packet. On the sponsor application the sponsor notes their intent to participate in CEP. For each site the sponsor selects CEP from the dropdown list as a provision option for both breakfast and lunch. The student reduced and paid meal prices are set to zero. If both breakfast and lunch are offered then both meal services must participated in CEP: an edit check should be in place to ensure that occurs.

The CEP grouping tool shows the list of sites and the DC percentage from the April DC reporting. At this time the sponsor can leave the sites as "individual" or group them with another site—so that a ineligible site can qualify if grouped with an eligible site as long as the group's DC percentage is greater or equal to 40%. An edit check should be enacted so that all sites participating in CEP have a DC percentage of at least 40% or greater, either individually or grouped together.

The information from the CEP grouping tool carries to the claim submission. We currently have site-based claiming. The process for CEP claiming is very similar to what was done before in our system under the traditional SBP/NSLP. However, the sponsor will only key in the number of total meals. The claiming percentage (which is currently 1.6 times the claiming percentage) is applied to separate the meals between free and paid for reimbursement purposes. For example, a DC percentage of 50% will result in 80% of the meals being reimbursed at the free rate and the remaining 20% at the paid rate. If schools are part of a group, then the entire group will have the same claiming percentage applied to all schools within that group.

CEP Grouping: Best Practices

✧ Two reasons to group sites

– Qualify a near-eligible site with an eligible site

- Northern Elementary: $105/300=35\%$ DC
- Lincoln Elementary: $325/500=65\%$ DC

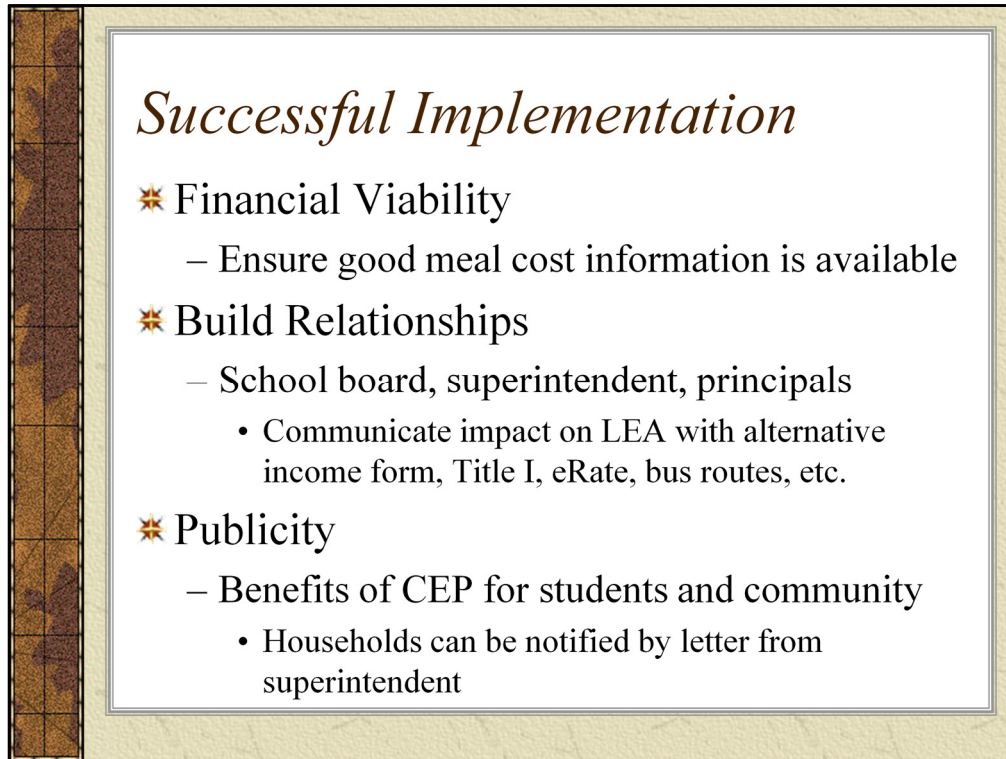
Resulting Group: 53.75% DC

– Site with $>100\%$ claiming percentage

- When a site has greater than 62.5% DC than group with another site so as not to exceed 100% of meals being reimbursed at free rate

In my work with districts I have found two key reasons that districts might group sites. The first reason is to qualify a near eligible site with an eligible site. In this example, to qualify Northern Elementary for CEP it is grouped with Lincoln Elementary. The resulting claiming percentage is 53.75%. Notice that the calculation is based on the sum of DC students divided by the total number of students with access to SBP/NSLP.

The second situation to group schools is when the site's DC percentage exceeds 62.5%: in this case the claiming percentage (1.6 times the DC percentage) will exceed 100%. This can often occur with alternative schools. Since only 100% of meals will be reimbursed at the free rate in this case it is beneficial to group the school with one or more sites so that the total claiming percentage is equal to or less than 100%.

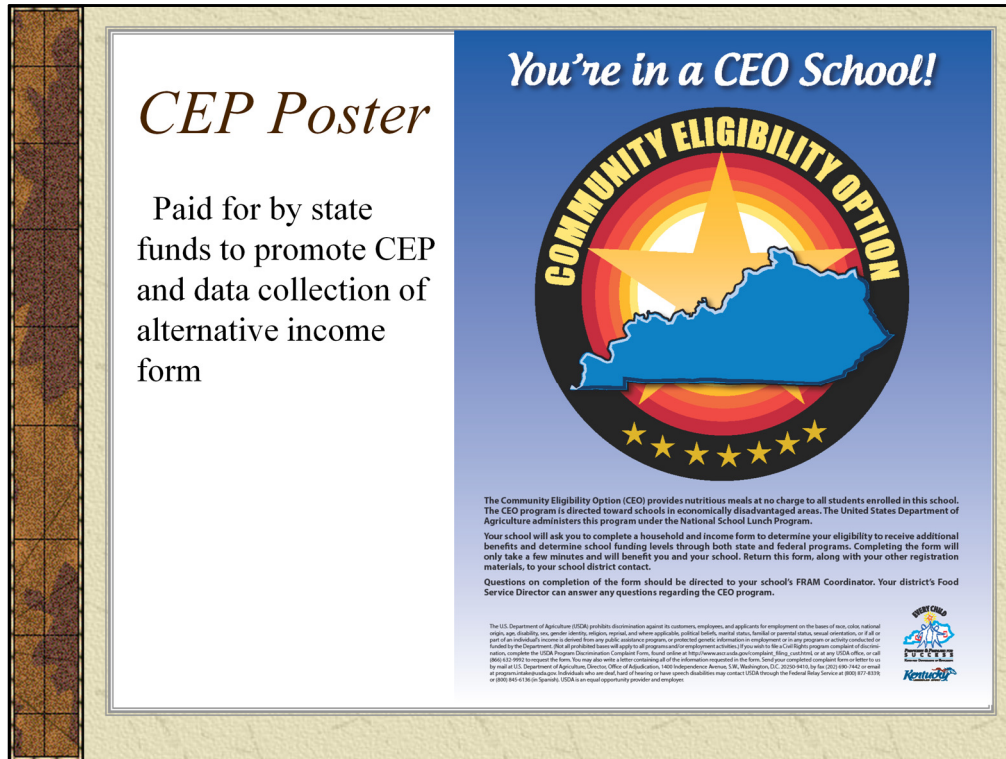


Successful implementation of CEP depends on many factors for the LEA. Three key factors include financial viability, building relationships within the district and good publicity.

To properly determine financial viability good meal cost information must be available. We have that information in our menu compliance software.

In regards to relationships the food service director must have good working relationships with key leaders. The superintendent and school board will be involved in decision-making due to CEP's effect on Title 1 and the possibility of covering any shortfall with food service. Also, while the food service director has control over the cafeteria the principal has responsibility over the entire school. Alternative meal sites, such as meal service in the gym or the classroom, will need the principal's permission. Bus routes may need to be changed to allow students more time to have breakfast.

To publicize CEP several different approaches have been: letter from the superintendent sent home to the student household, information displayed on the TV monitors in the hallways, brief videos, social media, announcements during the back to school night, etc. Kentucky has developed a CEP poster for their schools as shown on the next slide.



Two copies of the CEP poster are provided to each CEP participating site. A poster is placed near the main office and another is for the cafeteria. The first paragraph provides a brief explanation of CEP, that all students will receive a meal at no charge. The second paragraph explains the importance of completing and returning the alternative income form to determine a student's eligibility for educational benefits. In the final paragraph the reader is directed to ask any questions on the alternative income form to the FRAM Coordinator (who processes the alternative income forms) and to share any questions on CEP with the food service director.

LEA: Alternative Income Form

- ✧ KY developed household and income form (HIF) to collect socioeconomic status
 - Necessary for state education funding calculation and state reporting requirements
- ✧ Mimics standard household application

In Kentucky the state education funding formula provides additional monies for students with a free meal status. Based on this—and other state and federal reports - districts needed to continue identifying individual students with a free, reduced or paid status. The decision was made to develop a state form that closely mimics the standard USDA household application. The decision to use the standard household application was done for several reasons: 1) the statewide student information system had a module to process the household application, 2) the SES status of free/reduced/paid must be consistent across districts due to fairness and equity issues, 3) the USDA Income Eligibility Guidelines and USDA guidance could easily be used for training.

The process has worked well, although processing the HIF forms does take time (as food service directors already know). A resource person at KDE has been assigned to answer questions and provide training to the FRAM Coordinators, who collect and process the forms. FRAM Coordinators receive training over the summer months. We have done this through a combination of live and webinar trainings.

LEA: Processing the HIF

- ✦ District staff process HIF form in statewide student information system (SIS) through state funds
 - Module in SIS allows for processing HIF forms with USDA guidelines
 - Obtain free, reduced or paid SES
- ✦ No food service personnel allowed to process HIFs

Districts must appoint a staff person to collect and process the form, who is called the FRAM Coordinator. The work involves distributing, collecting and processing the HIF forms. In Kentucky the food service director still has responsibility for downloading the DC file—and importing the DC status to the POS and the student information system (which has a means to import the DC file and perform the matching process).

A variety of staff positions act as the FRAM Coordinator – CFO, secretarial staff, Director of Pupil Personnel, etc. but cannot be paid out of food service funds. Most often it is an administrative staff person who serves in this capacity.

LEA: HIF Workload Estimation

Estimate of HIF form data processing time:

Total student households

Less DC households

Less overtly paid students (default is paid)

Less mixed households (mixed CEP only)*

*Mixed households include CEP and non-CEP siblings; if the household completes an NSLP application then this can be shared with FRAM Coordinator

A primary concern raised among districts is the time to process the HIF forms. The time for CEP districts is lessened due to the high number of students who are directly certified. (However, LEAs are instructed to send HIF forms to all students so as not to identify any household that may be directly certified.) Overtly paid students includes those that district staff are generally aware that will not return the HIF form since they will not qualify. For partial CEP districts, mixed households can use the NSLP household application to determine SES in lieu of completing the HIF form. The food service director provides the meal status determination to the student information system. LEAs are reminded that the HIF form is based on households, and not individual students, which reduces the paperwork burden.

LEA: Promoting CEP

- ✦ CEP poster developed to explain CEP and encourage return of HIF form
 - 2 posters per feeding site
- ✦ Increasing return rate on HIF
 - Popsicle party
 - Back to school night distribution
 - No HIF = No parking permit for HS students
 - District staff contacting guardians

A poster explaining CEP was developed to encourage return of the HIF form as well as explain the CEP program: this was shown on an earlier slide. Districts have discretion on the means to increase the return rate. A full list of ideas to increase the return rate from districts is on the KDE CEO website.

Resources

Kentucky

- Child Nutrition Program:

<http://education.ky.gov/federal/SCN/Pages/Community-Eligibility-Option.aspx>

- HIF Form:

[http://education.ky.gov/districts/shs/pages/community-eligibility-option-\(ceo\).aspx](http://education.ky.gov/districts/shs/pages/community-eligibility-option-(ceo).aspx)

Report on CEP

- <http://frac.org/federal-foodnutrition-programs/national-school-lunch-program/community-eligibility/>

Shown here are resources for states. The first link relates to the Child Nutrition Program and resources for Food Service Directors. The second link is for the FRAM Coordinators regarding the HIF form. The report on CEP was done by FRAC and provides good information on CEP in general. Illinois also has a good website with more information on CEP: <http://www.isbe.net/nutrition/htmls/nsfp-hhfka-ceo.htm> The USDA is also developing a website that contains CEP information and materials: however, at this time it's unknown when that will be made available.



Here is a picture of our two children, Joshua and Lauren. We adopted Lauren from an orphanage in Mumbai, India a year ago. Upon arriving home she exhibited food insecurity issues. She would eat 3 bananas – for breakfast. Since that time she has improved greatly. Her two favorite foods now are chocolate and pizza.

Like Lauren, children in your state face food insecurity issues in their homes as well, either a lack of food or insecurities about its availability. The Community Eligibility Provision has some challenges associated with implementation. And some real work about getting it started. However, CEP has shown to result in significant increases in both breakfast and lunch participation. Please remember that as you work through these issues. Many more children will receive a nutritious meal. I know that's proven true for Kentucky.

You can reach me at Brad.Blunt@education.ky.gov

Best wishes on your implementation of CEP.